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KERN COUNTY HEALTH DEPARTMENT

ENVIRONMENTAL HEALTH DIVISION

HEALTH OFFICER
Leon M. Hebertson, M.D.

DIRECTOR

REFERENCE 47

SFUND RECORDS CTR
2335625



September 1, 1987

Department of Health Services
Northern California Section
Toxic Substances Control Division
4250 Power Inn Road
Sacramento, CA 95826

Attn : James Allen, Chief

Subject: Keystone Resources, Inc.
201 Industrial Street
Bakersfield, CA 93307
EPA I.D. # CAX000109330 (Hazardous Waste Treatment Facility).

On July 17, 1987 our Department conducted an infectious waste inspection of Keystone Resources Inc. Violations noted are as follows:

- (1) Facility fails to identify date of receipt of Infectious Waste for ultimate treatment and disposal within 96 hours. (incinerate) (22 CAC 66855 BB 4).
- (2) Failure to store infectious waste below 32 degrees Fahrenheit if unable to treat and dispose within 96 hours. (22 CAC 66810 (c) 4) (22 CAC 66810).
- (3) Facility hauls infectious waste to T.C.I. (Thermal Combustion Innovators) 241 West Laurel Street, Colton, CA 92324, for disposal. (22 CAC 66850 e).
- (4) Non-compliance with facility's operation plan (22 CAC 66855 - (9, 9d)).

DISTRICT OFFICES

Delano . Lamont . Lake Isabella . Mojave . Ridgecrest . Shafter . Taft

SEP 3 11 45 AM '87
TOXIC SUB
CONTROL

Violation of Operation Plan include:

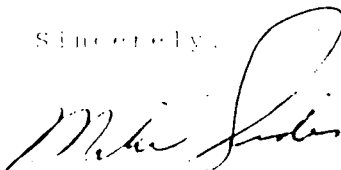
- (a) **Plant Operation** (page 7)
Material to be incinerated within 24 hours.
- (b) **Safety Equipment** (page 11)
Lunch room used for storage of infectious waste.
- (c) **Storage Area** (page 16)
Material not tagged nor kept separate from previously placed groups - held over 96 hours, not withdrawn for incineration in order of arrival.
- (d) **Wash Water Disposal** (page 19)
Wash pits not connected to sewer - operation plan states sewerage to county when in fact it is a city service (22 CAC 66845 (a 3)).
- (e) **Overtime Wastes** (page 22 revised)
Facility may not dispose at landfill due to types of wastes received (cultures and tissues, anatomical parts), from producing facilities that require incineration (22 CAC 66835 (c)) Cease and Desist Order # 1-2-87 1-1-87
- (f) **Cup # 28 Map # 103 33** -
Letter from Department of Health Department Requirement to store infectious waste in room to hold wastes to be incinerated - down for compliance
- (g) **Operation Procedures** (22 CAC 66840 (d))
Subject to inspection - operation Failure to not to and not to be better maintenance on incinerator required more than 14 four days (22 CAC 66840 (d))
- (h) **Emergency Plan**
- I. **On-site Storage** Failure to store infectious waste below 32 degrees Fahrenheit if held more than 96 hours - (22 CAC 66840(d)).
- II. **Off-site Disposal** Failure to notify Health Officer if on-site storage is not practical or possible (22 CAC 66840 (d))

Transport and transfer of infectious waste for disposal to Thermal Combustion Innovators (T.C.I.) by Keystone Resources violates conditions of the Operation Plan approved by D.O.H.S.; this practice also places unwarranted risks and liabilities on the infectious waste producer client due to the unqualified permit status of T.C.I.

Numerous infectious waste generators in Kern County contract with Keystone Resources for incineration due to the sensitive nature of the waste (tissues, anatomical remains, cultures). It is apparent that Keystone Resources is unable to store and incinerate contracted infectious waste within designated time limits. Numerous violations of Title 22 CAC as well as non-compliance with the approved Operation Plan demands a close scrutiny of Keystone Resources hazardous Waste Treatment Facility Permit, and withdrawal of approval for acceptance, storage, and treatment of infectious waste under 22 CAC 66855(d).

Our department wishes to resolve this matter promptly, therefore we request a response to this letter within seven days of receipt delineating actions the Department of Health Services will implement to correct itemized violations.

Sincerely,



Mike Sides, EHS IV
Infectious Waste
Program Manager